

FCC
Order
Ref. 90-
571

FCC Requirement

Sprint's Commitment

Three-way calling feature is generally arranged in one of two ways. (§73)

1. The TRS consumer may request that the CA set up the call with two other parties

or;

2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.

This requirement is waived for Internet Relay and Video Relay Services. (§76)

Sprint has supported three-way calling capabilities, from the customer's premises, since September 1, 1995.

Appendix K: FCC CapTel Mandatory Minimum Standards & Compliance Matrix

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|--|---|--|
| <p>1. The Commission defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS.</p> | <p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition - i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities - we conclude that captioned telephone VCO service falls within statutory definition of TRS.</p> | <p>Sprint has been a CapTel provider, on trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-complaint CapTel service, first-ever in the TRS Industry.</p> <p>Speech-to-speech relay service for CapTel is waived by FCC. See Section 64.604 A.3.</p> <p>Sprint is also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>Sprint is able to process inbound 711 calls to include access to CapTel services.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|--|--|---|
| Operational Standards | | |
| <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).</p> <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for enhancing transmission speed..." (§39)</p> <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for enhancing transmission speed..." (§39)</p> | <p>Requirement applies.</p> <p>Use of CapTel's voice recognition software "is a permissible means for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).</p> <p>Waived. Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for enhancing transmission speed..." (§39)</p> <p>Waived. Permits use of Oral-to-text tests instead.</p> | <p>Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job.</p> <p>All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures.</p> <p>A captioned telephone user does not type in making a call, therefore is never the opportunity for the CA to have to interpret typewritten ASL</p> <p>CapTel's voice recognition technology transmits above 100 WPM.</p> <p>Oral to text tests are given to all CapTel CAs</p> |
| <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for achieving the CA's competency skills required by the TRS mandatory minimum standards" (§39).</p> <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for enhancing transmission speed..." (§39)</p> <p>...the use of voice recognition software to provide a relay service to a deaf or hard of hearing person is a permissible means for enhancing transmission speed..." (§39)</p> | <p>Requirement applies.</p> <p>Requirement applies.</p> | <p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|-----------------|---|---|
| | <p>Waived for outbound calls (§ 46) because the CapTel CA is not involved in call set up and cannot refuse the call (§46).</p> <p>Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number no set up is involved and the CapTel CA cannot refuse to call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 - 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p> | <p>CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.</p> <p>CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p>CapTel is capable of handling all call types normally provided by common carriers.</p> |
| | <p>Requirement applies.</p> <p>Requirement applies.</p> | <p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|---------------------|--|---|
| | Requirement applies. | CapTel CAs stay on all calls for a minimum of 10 minutes. |
| | Waived. (§ 36, 47-48). | |
| | Waived. (§29) | |
| Technical Standards | | |
| | Waived. (§53-54) | |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|---|---|---|
| <p>Section 225 of the Communications Act requires that interstate long distance carriers provide a minimum level of service to their customers. This includes the requirement that carriers must provide a minimum level of service to their customers, including the requirement that carriers must provide a minimum level of service to their customers.</p> | <p>Requirement applies.</p> <p>Requirement applies.</p> <p>Requirement applies.</p> | <p>Sprint CapTel ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed. Sprint does not put calls in a queue or on hold.</p> <p>Abandoned calls are included in the speed-of-answer calculation.</p> <p>Sprint CapTel system is designed to a P.01 standard or greater measured on a daily basis.</p> |
| <p>Section 225 of the Communications Act requires that interstate long distance carriers provide a minimum level of service to their customers. This includes the requirement that carriers must provide a minimum level of service to their customers, including the requirement that carriers must provide a minimum level of service to their customers.</p> | <p>Requirement applies.</p> | <p>CapTel users will be able to choose their IXC carrier through the CapTel Carrier of Choice program allowing for the same access that is provided to voice users.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|-------------------|--|--|
| <p>[REDACTED]</p> | <p>FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)</p> <p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p> | <p>Sprint CapTel is available 24 hours a day, everyday.</p> <p>Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p> |
| <p>[REDACTED]</p> | <p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p> | <p>Sprint is the nation's leader in the development and offering of technological features for TRS.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|---|--|---|
| <p>[The following text is heavily obscured by a dark, noisy pattern, likely representing redacted content or a scanning artifact. It appears to be a list of FCC requirements.]</p> | <p>Requirement applies.</p> | <p>CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.</p> |
| | <p>Requirement applies.</p> | <p>CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.</p> <p>Sprint CapTel supports pay-per-call call types.</p> |

Functional Standards

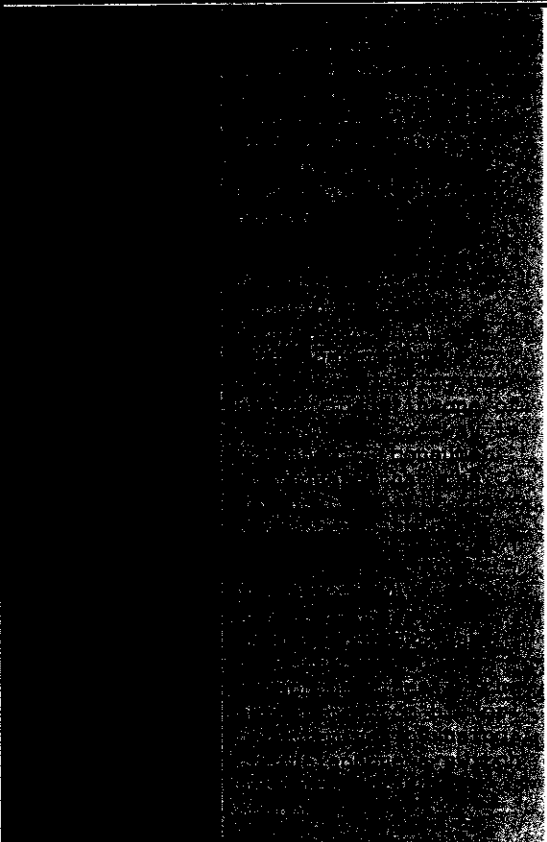
| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | | Sprint's Commitment |
|-----------------|--|----------------------|--|
| | | Requirement applies. | <p>Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p> |
| | | Requirement applies. | <p>Sprint CapTel provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.</p> |
| | | Requirement applies. | <p>Sprint follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|-------------------|--|---|
| <p>[REDACTED]</p> | <p>Requirement applies.</p> | <p>CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.</p> |
| <p>[REDACTED]</p> | <p>Requirement applies.</p> | <p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p> <p>(iii) Sprint works with NECA for reimbursement of interstate minutes.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|-----------------|--|--|
| | Requirement applies. | The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements. |
| | Requirement applies. | Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information. |
| | Requirement applies. | Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process. |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|---|---|--|
| <p>Section 225.1(b)(1) requires that a telecommunications service provider that provides a telecommunications service to a customer must provide that service in a manner that is consistent with the requirements of the FCC's rules and regulations. This requirement applies to all telecommunications services provided by a telecommunications service provider, including CapTel.</p> | <p>Requirement applies.</p> <p>Minimum standards pertaining to HCO are waived.</p> <p>VCO requirements still apply.</p> | <p>Sprint CapTel will have the capability to transmit the 10-digit number and will recognize the ID blocking indicators.</p> <p>Sprint CapTel will deliver the SS7 technology on February 1, 2004.</p> <p>Sprint CapTel supports the VCO calling combinations.</p> |
| <p>Section 225.1(b)(2) requires that a telecommunications service provider that provides a telecommunications service to a customer must provide that service in a manner that is consistent with the requirements of the FCC's rules and regulations. This requirement applies to all telecommunications services provided by a telecommunications service provider, including CapTel.</p> | <p>Requirement applies.</p> | <p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> |
| <p>Section 225.1(b)(3) requires that a telecommunications service provider that provides a telecommunications service to a customer must provide that service in a manner that is consistent with the requirements of the FCC's rules and regulations. This requirement applies to all telecommunications services provided by a telecommunications service provider, including CapTel.</p> | <p>The requirement was not addressed in the Declaratory Ruling.</p> | <p>Answering machine and voicemail retrieval is provided by CapTel.</p> <p>Answering machine retrieval through CapTel is accomplished when the CapTel facility caption the voice message to the CapTel users.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|-----------------|--|---|
| | | <p>Waived. (¶ 52)</p> |
| | | <p>The requirement was not addressed in the Declaratory ruling.</p> <p>CapTel telephones have the Speed Dial feature.</p> |

| FCC Requirement | FCC CapTel Declaratory Ruling (FCC 03-190) | Sprint's Commitment |
|--|---|---|
|  | <p>The requirement was not addressed in the Declaratory Ruling.</p> | <p>Sprint CapTel users will be able to participate a three way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing telephone switch hook (or "flash") button on his or her CPE. Thus, Sprint CapTel meets the requirement for three-way calling.</p> <p>(For One-Line CapTel.) For Two-Line CapTel either party can initiate a 3 way call should the user purchased this as a LEC option.</p> <p>Sprint CapTel users will be able to participate in a conference bridge to speak to three or more individuals.</p> |

Appendix L: Sprint's Report to the FCC on VRS and IP Waivers

**FCC Internet and Video Relay Service Annual Progress Report
April 16, 2007**

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|-------------------|-----------------------|---|--|---|--|---|
| 1. STS | Waived through 1/1/08 | STS is not possible over the internet. Voice over IP (VoIP) **REQUIRES** Quality of Service. QoS means that all the associated data packets arrive in one contiguous stream and in order. In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. There is, at this time, no universal, cooperative methodology to address the internet deficiencies. | In research and development stage. Sprint is investigating and evaluating several VoIP to determine acceptable QoS levels to support STS calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally. | Waived Indefinitely; No report required | NA | NA |
| 2. Spanish Relay | NA | NA | NA | Compensable but non-mandated service. | NA | Sprint provides ASL to Spanish Video Relay Service. |
| 3. Types of Calls | NA | NA | NA | Waived through 1/1/08 | Voice over IP(VoIP) requires Quality of Service. QoS means that all the associated | We are currently providing two-line VCO and HCO controlled at |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|----------------------------|-----------------------|---|---|-----------------------|---|--|
| | | | | | <p>data packets arrive in one contiguous stream and in order.</p> <p>In the "internet" world, there are many segments owned by multiple providers using dis-similar routers. Some support QoS, some do not. The internet cannot be controlled by any single user. There is, at this time, no universal, cooperative methodology to address the internet deficiencies.</p> <p>Sprint offers alternatives VCO and HCO solution by using second line (analog line) where the Video Interpreter asks for a second number to call back using three-way call feature. The procedure is similar to two-line VCO or HCO call.</p> | <p>the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO and HCO began in 2005. This is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment.</p> |
| 4. Emergency Call Handling | Waived through 1/1/08 | Internet Protocol network (IP network) does not support the Automated | Sprint implemented a "manual" (directory assistance | Waived through 1/1/07 | Internet Protocol network (IP network) does not support the Automated | No additional information to submit beyond our recent |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|--|---|---|---|--|---|--|
| | | Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP. | lookup) process for 911 calls through Internet Relay. The technical challenge remains of tying an exact location to an IP address. No additional development has been made that would allow Internet Relay users to place 911 calls through Internet Relay. | | Number Identification information for Internet or Video Relay Services. Without automated knowledge of the originated location of the call, Sprint is not in position to transfer 911 calls to an appropriate PSAP. | submission to the FCC. Current options may restrict interoperability. An Emergency database is still in use today for subscribers who choose to register a profile; however, agents must verify the location of the caller, as the caller may not be at the same physical location as the profile indicates. |
| 5. Speed of Answer | NA | NA | NA | 1/1/07- 80% of all calls within 120 seconds (monthly). | Sprint is exceeding the 80/120 service level requirement that went into effect January 1, 2007. | Sprint will continue to meet the requirement measured on a monthly basis. |
| 6. Equal Access to Interexchange Carrier | Waived Indefinitely; No report required | NA | NA | Waived through 1/1/08 | The IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and without an ANI to charge back for tolls calls, Sprint cannot support equal access to | The technical challenge remains of tying an exact location to an IP address for VRS users. However, the very nature of the internet makes billing for toll calls obsolete. |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|--------------------------------------|-----------------------|---|---|-----------------------|---|---|
| | | | | | interexchange carrier features for Video Relay Service. | |
| 7. Pay-per-call (900) Service | Waived through 1/1/08 | IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls. | The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Internet Relay end users to be billed for pay-per-call services. | Waived through 1/1/08 | IP network does not support ANI and end-user billing mechanisms. Without automated knowledge of ANI location, and no ANI to charge back for a pay-per-service call, Sprint is not processing 900 calls. | The technical challenge remains of tying an exact location and billing of pay-per-call. No additional development has been made that would allow Video Relay end users to be billed for pay-per-call services. |
| 8. Voice Carry Over (VCO) (one-line) | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Voice carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally. | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint is currently providing two-line VCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line VCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|--|-----------------------|--|---|-----------------------|--|---|
| | | | | | | connection at end user equipment. |
| 9. Hearing Carry Over (HCO) (one-line) | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint is investigating and evaluating several VoIP alternatives to determine acceptable QoS levels to support Hearing carry-over calls. Sprint is also investigating LAN/WAN systems where QoS can be controlled internally. | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint is currently providing two-line HCO controlled at the agent position using IP or ISDN inbound from Video user and outbound POT S to Video User and outbound POTS to Voice user. One line HCO, released in 2005, is limited to certain types of end user appliances that allow voice access through the broadband connection at end user equipment. |
| 10. VCO - to - TTY | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|--------------------|-----------------------|--|---|-----------------------|--|---|
| | | | baudot protocols are not compatible. | | | because. the videoconferencing via internet or ISDN protocols are not compatible. |
| 11. HCO - to - TTY | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible. | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible. |
| 12. VCO - to - VCO | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or VCO as communication between internet and baudot protocols are not | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|--------------------|-----------------------|---|--|-----------------------|--|---|
| | | | compatible. | | | ISDN protocols are not compatible. |
| 13. HCO - to - HCO | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Internet Relay Service is not designed to connect an inbound internet caller with the called party who uses TTY user or HCO as communication between internet and baudot protocols are not compatible. | Waived through 1/1/08 | As explained in number three above, voice quality over the internet is not universally effective at this time. | Sprint's Video Relay Service is not designed to connect an inbound video caller with the called party with uses voice, TTY user, VCO, HCO or anything other than video because videoconferencing via internet or ISDN protocols are not compatible. |
| 14. Call Release | Waived through 1/1/08 | An Internet Relay caller utilizes IP data to place an inbound call. The Call operator connects the outbound dialing voice call utilizing Signaling System 7 (SS7). Since these two types of calls are not compatible, the call release feature is not technically feasible. | It is not technically feasible at this time to provide call release features with Internet Relay calls. However, Sprint will continue to investigate new developments to allow Internet Relay customers to use this feature. | Waived through 1/1/08 | A VRS customer utilizes a video connection to make an inbound call. The VRS operator utilizes a voice channel (SS7) to make an outbound dial. Because the two types of calls are not compatible, the call release feature is not technically feasible. Also, in the VRS environment, we are currently unable to remove the Video Interpreter | It is not technically feasible at this time to provide call release features with Video Relay calls. However, Sprint will continue to investigate new developments to allow Video Relay customers to use this feature. |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|-------------------|-----------------------|---|---|-----------------------|--|---|
| | | | | | agent from the middle of the call when the inbound video caller reaches an outbound customer who also has video capability. | |
| 15. 3-way Calling | Waived through 1/1/08 | The current Internet Relay call environment does not support the capability to perform three-way calling initiated call from agent via Sprint IP. | It is possible for the customer to initiate a three-way call if he/she has conference calling capability. In this case, the operator does not needed to perform the three-way calling function. However, the limitation is that Sprint's Internet Relay Service will handle only one TTY user (and unlimited number of voice users) when using three-way calling via relay service. It is possible to have 2-Line VCO via Sprint IP using user-initiated three-way calling. | Waived through 1/1/08 | At this time, it is not technically feasible to provide a 3-way Video Relay call. Customers using VRS do not have the web-enabled ability to initiate 3-way video calls because of the limitations of end user equipment. Features of customer premise equipment are not under the control of the VRS provider, and therefore the VRS provider cannot control the establishment of a three-way call. | The voice customer is currently able to use the LEC-provided three-way calling feature. One or two of the three legs of the call can be engaged as they would without VRS being a part of the call. VRS is transparent to this process. The VRS agent who receives an inbound video connection has the ability to out dial to multiple voice parties to create a three-way call of which two parts are voice and one part is video. The VRS agent platform is however, unable to support a three way call |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|-------------------|-----------------------|--|---|-----------------------|--|--|
| | | | | | | between two video customers and one voice user at this time. |
| 16. Speed Dialing | Waived through 1/1/08 | Sprint's current Speed Dial system is supported by ANI driven customer profile. Without being able to identify the customer's ANI, Sprint is not able to access the preferred speed dial list. | Customers can maintain their own speed dial list on their computer and paste the phone number on the web prior to the call. The phone number will be pre-populated to agent's dialing window for efficient call processing. | Waived through 1/1/08 | This service is currently available for VRS customers who choose to use our webcam based product. They can create a speed dial list online and greatly improve the efficiency and connect time with the outbound party through the Video Interpreter. Individuals using TV-based videophones do not have this web enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform. | Individuals using TV-based videophones do not have this web-enabled ability to speed dial through VRS because of the limitations of this type of end user equipment. Features of customer premise equipment are beyond the control of the VRS provider and determine how the customer can interact with Sprint's platform. |

| Waivers | IP Regulatory Status | IP Current Technology Issue/Limitations | Progress and Steps Taken to Meet the Requirement | VRS Regulatory Status | VRS Current Technology Issue/Limitations | Progress and Steps Taken to Meet the requirement |
|-------------------------------------|----------------------------|---|---|-----------------------------|--|---|
| 17. Providing Service 24/7 | NA | NA | NA | NA | NA | NA |

Appendix M: Sprint Relay Fact Sheet

Sprint Relay

www.sprintrelay.com

Sprint is the leading provider of relay services in the United States so that those who are deaf and hard of hearing can have anytime, anywhere communications. With 16 years of experience in providing Telecommunications Relay Services (TRS), Sprint is the relay service provider for 31 states plus the Commonwealth of Puerto Rico, New Zealand and the federal government. Sprint has been awarded the following state TRS contracts:

| | | | |
|-------------|---------------|----------------|------------|
| Alabama | Indiana | New Mexico | Texas |
| Alaska | Illinois | New York | Utah |
| Arkansas | Massachusetts | North Carolina | Vermont |
| California | Minnesota | North Dakota | Washington |
| Colorado | Mississippi | Ohio | |
| Connecticut | Missouri | Oklahoma | |
| Delaware | Nevada | Oregon | |
| Florida | New Hampshire | South Carolina | |
| Hawaii | New Jersey | South Dakota | |

TRS enables standard voice telephone users to talk to people who are Deaf, Hard of Hearing or Speech-disabled on the telephone. Under Title IV of the Americans with Disabilities Act, all telephone companies must provide free relay services either directly or through state programs throughout the 50 states, the District of Columbia, Puerto Rico and all of the U.S. territories. Sprint Relay's experience in the field provides the assurance that all services delivered will meet or exceed Federal Communications Commission mandates for TRS.

Sprint Relay Services

Traditional relay services involve a relay operator serving as an intermediary for phone calls between a deaf, hard of hearing and speech-disabled user and a hearing party. The TRS operator speaks words typed by a deaf user on a text telephone (TTY) or via the Internet and relays the hearing person's spoken response by typing back to the deaf user.

Emerging Technology:

Under the Americans with Disabilities, all telephone companies are required to pay a percentage of the money that they collect from their subscribers into a national telecommunications relay services fund. This interstate fund is administered by NECA (National Exchange Carriers Association).

Currently, two technologies are funded through NECA – video and Internet relay services. There is strong competition in the TRS industry due to the fact that no state contract is required in any state to process calls through the Internet.

Video relay services (VRS) provides American Sign Language (ASL) users with an attractive alternative that offers them the opportunity to communicate by video conferencing using ASL their native language, which may be preferred over the traditional TTY relay service. VRS requires users to have a personal computer or television monitor, a Web camera or videophone and high-

speed Internet connectivity such as cable and DSL. Sprint Video Relay, powered by CSD (Communication Services for the Deaf), is a free service through the Internet that enables the deaf or hard of hearing user to communicate in ASL to a hearing or standard telephone user. Sprint Relay and CSD launched the first nationwide Video Relay Service in May 2002. To connect with a video interpreter, visit www.sprintvrs.com.

Sprint IP Relay is also a free service that combines TRS with the ease and ubiquity of the Internet, allowing users to make calls from any PC or selected Web-enabled Internet wireless devices without having to use traditional TTY equipment. Sprint IP Relay users also have the flexibility of using AOL Instant Messenger to access Sprint IP Relay. To connect using a website, go to www.sprintip.com. To connect using AOL Instant Messenger, send a 10-digit number to the screen name **SprintIP**. Both access methods will connect the caller to an experienced Sprint Relay operator.

Sprint IP Wireless Relay is a new service that allows customers who are deaf, hard-of-hearing or who have a speech disability to use wireless relay services on a select number of wireless devices:

- 1) BlackBerry phones (with an operating system 4.0 or higher). Customers can use this service to communicate with any standard or mobile telephone user in the United States via a free downloadable application at www.sprintrelay.com/download/. Users simply select a contact from their address book or enter a phone number with accompanying text instructions to a Sprint IP Relay Operator.
- 2) PPC6700 devices – To download the free Sprint IP Wireless application, go to: www.sprintrelay.com/download/treo.

Sprint IP Wireless allows users to have the mobility to make a relay call when they need to without a TTY or computer and can be assured the connection is with an experienced Sprint Relay operator.

CapTelSM (Captioned Telephone) relay service is a leading-edge technology developed by Ultratec, Inc. of Madison, Wis., that allows people to receive both voice and text captioning, nearly simultaneously. A special, CapTel-equipped phone is required in order to place a call through the CapTel relay service. The CapTel phone works like any traditional phone with callers talking and listening to each other, but with one very significant difference – captions are provided live for every call. The captions are displayed on the CapTel phone's built-in screen so the user can read the words while listening to the voice of the other party. For more information on CapTel, visit www.captionedtelephone.com.

Relay Conference CaptioningSM, developed by Caption Colorado, combines real-time captioning and standard relay service to provide relay conference captioning calls for deaf and hard-of-hearing individuals (in participating Sprint Relay state programs). By using an Internet Text Streaming platform supported by skilled captionists, RCC provides highly accurate real-time captioned text for any live conference call.

For more information, please visit www.sprintrelay.com

Appendix N: Copy of TSP Press Release

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General Press Release

Sprint Completes Voluntary Telecommunications Services Priority Program Enrollment for Relay Network

OVERLAND PARK, Kan. – November xx, 2005 – Sprint (NYSE: S) today announces that it has completed the final milestone in enrolling Sprint's telecommunications relay service (TRS) in the FCC's Telecommunications Service Priority (TSP) Program. Sprint TRS, communications services available for individuals who are deaf, hard of hearing or have a speech disability, is comprised of a network of call centers geographically disbursed throughout the United States.

Effective October 31, 2005, all 14 Sprint Relay call centers were successfully activated under the TSP Program. Unlike other TRS providers, Sprint's TRS network is designed to reroute traffic to other Sprint Relay centers across the country to continue uninterrupted service with minimal customer impact.

"In less than five months, we were able to complete the implementation of the FCC's TSP program," said Mike Ligas, director of Sprint Relay. "Sprint is dedicated to providing effective communications services for individuals who are deaf or hard of hearing and we recognized the urgency to ensure reliable communications during emergency situations."

In 1988, TSP program was established to prioritize the restoration of telephone service to critical facilities and agencies at times when telecommunications companies are typically overburdened with service requests, such as after a natural disaster. In the event of a regional or national crisis, the program restores telephone services most critical to national and homeland security on a priority basis.

Sprint Relay Portfolio of Services

Sprint has 15 years of experience in providing relay services to persons who are deaf, hard of hearing or deaf-blind or who have a speech disability to communicate with hearing persons on the phone. Sprint offers relay services through an intelligent platform to the federal government, 30 states, the Commonwealth of Puerto Rico and New Zealand. Sprint's experience in the field provides the assurance that all Sprint Relay services will meet or exceed Federal Communications Commission requirements for telecommunications relay services (TRS). Relay service is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or call length. For more information, visit www.sprintrelay.com.

Sprint Government Systems Division (www.sprint.com/government) is based in Reston, Va., and offers the full range of Sprint product and service offerings for federal and state government customers.

About Sprint Nextel

Sprint Nextel offers a comprehensive range of wireless and wireline communications services to consumer, business and government customers. Sprint Nextel is widely recognized for developing, engineering and deploying innovative technologies, including two robust wireless networks offering industry leading mobile data services; instant national and international walkie-talkie capabilities; and an award-winning and global Tier 1 Internet backbone. For more information, visit www.sprint.com.